

industry.” *Id.* at 7 (quoting *Alice Corp. Pty. Ltd. v. CLS Bank Int’l*, 134 S. Ct. 2347 (2014)) (alteration omitted). The court held these claims ineligible under § 101 because “relying on a computer to perform routine tasks more quickly or more accurately is insufficient to render a claim patent eligible.” *Id.* at 8. The court also indicated that *DDR Holdings, LLC v. Hotels.com, L.P.*, 773 F.3d 1245 (Fed. Cir. 2014), is limited to claims that “recite a specific manipulation of a general-purpose computer such that the claims do not rely on a computer network operating in its normal, expected manner.” Slip Op. at 8 (internal quotation omitted).

In the second case, *Ariosa Diagnostics*, the court held ineligible a patent claiming the discovery of a certain type of DNA on the ground that the methods used to isolate the DNA were “conventional, routine, and well understood applications in the art.” Slip Op. at 13. Notably, the court rejected the patentee’s argument that a method that “does not preclude alternative methods in the same field is non-preemptive, and, by definition, patent-eligible under Section 101.” *Id.* at 14. Instead, “questions on preemption are inherent in and resolved by the § 101 analysis.” *Id.* “While preemption may signal patent ineligible subject matter, the absence of complete preemption does not demonstrate patent eligibility.” *Id.*

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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2015, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to CM/ECF participants in this case.

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